

Riva, Steven

From: Ruvo, Richard
Sent: Wednesday, November 26, 2014 1:41 PM
To: Riva, Steven
Subject: FW: Anellotech's smokestack

Do we know if there is a state permit action on this?

From: Iglesias, Ariel
Sent: Wednesday, November 26, 2014 1:15 PM
To: Ruvo, Richard
Cc: Filippelli, John
Subject: FW: Anellotech's smokestack

Rick,

Do you guys have any information on this facility? Can you please have someone look into this.

Thanks,

ariel

From: Enck, Judith
Sent: Wednesday, November 26, 2014 8:46 AM
To: Cindy Ruiz
Cc: Iglesias, Ariel
Subject: Re: Anellotech's smokestack

Ms Ruiz. My colleague Ariel Iglesias will look in to the situation and get back to you. Let us know if you have been in contact with anyone at the nys dept of environmental conservation. Thank you.

Sent from my iPhone

On Nov 26, 2014, at 1:11 AM, "Cindy Ruiz" <ruizruizruiz@ymail.com> wrote:

Hi. My name is Cindy. I live in Pearl River, NY where Allotech plans to construct a smoke stack from which benzene, toluene and other known carcinogens will be released into a densely populated suburb. The residents from our town were taken aback to find that we were not notified and that the planning boards are seemingly allowing this. There really wasn't an opportunity to weigh in on this. Many residents live less than 500 feet from the property. I was interested in finding out where the EPA stands on this? The company has claimed that they aren't require to monitor the emissions being released less than half a mile from several schools. This facility was opened decades ago when the town was mills and farms and and the facility itself was much smaller. In light of current technological advances we need to reevaluate the facility and community to ensure that the research done there reflects and respects the

quality of that the residents of our community and neighboring communities expect.
Thank you.

Sent from my iPhone

Riva, Steven

From: Stanton, Robert J (DEC) <robert.stanton@dec.ny.gov>
Sent: Monday, December 01, 2014 3:32 PM
To: Riva, Steven
Subject: FW: Annollotech

fyi

From: Sweikert, George (DEC)
Sent: Monday, December 01, 2014 3:18 PM
To: Flint, Steven (DEC)
Cc: Stanton, Robert J (DEC); Gentile, Tom (DEC)
Subject: Annollotech

Steve, Just a headsup. Residents are very concerned about a Biomass to liquid BTX pilot plant. They have reached out to "Iglesias" at EPA. It's an R&D facility that doesn't require permitting but is still subject to 212. Also has a lot of proprietary equipment and the majority of the information they told us today was confidential. The 99 ft smokestack is a 6 ft vent stack (2 in in diameter) on a 90 ft building. Very hard to get information out between no application and the confidentiality associated with R&D.

We met with them today and they are going to put a catalyst on and will be working with Central Office staff (haven't told Tom yet but I will) on an AERSCREEN evaluation.

<http://www.lohud.com/story/news/local/rockland/2014/11/28/orangetown-fears-proposed-smokestack-may-spew-pollution/19556341/>

ANNELLOTECH (Pearl River, Rockland County located on the PFIZER Campus): This is a proposed pilot scale R&D facility that would produce kg scale Benzene/Toluene/Xylene (BTX) from sawdust/wood, to be used as feedstock for the plastics industry. At an Orangetown Zoning Board of Appeals meeting on Wednesday, 11/19/14, the facility stated that they would be constructing a "99 ft smokestack" as part of the expansion and BTX would be emitted. There has been a high degree of interest from residents that are concerned with the emissions associated with this process, as well as how the project will affect the area's homes, schools and reservoirs. They have also reached out to USEPA, RCDOH, NYSDOH. While R&D activities are exempt from Air Permitting, the proposed facility is still subject to the Toxics provision of Part 212. DAR met with the facility on 12/1 and the facility will be installing a catalytic oxidizer (99% control) on the stack and will be submitting an (AERSCREEN) emissions modeling evaluation. The Orangetown Zoning Board has requested that DEC review the project. **ACTION-FYI**

Riva, Steven

From: Stanton, Robert J (DEC) <robert.stanton@dec.ny.gov>
Sent: Wednesday, December 03, 2014 11:31 AM
To: Riva, Steven
Subject: FW: Annellotech

The latest

From: Sweikert, George (DEC)
Sent: Wednesday, December 03, 2014 9:40 AM
To: Rudolph, Thomas (DEC)
Cc: Brand, Martin (DEC); Flint, Steven (DEC); Stanton, Robert J (DEC); Whitehead, Daniel T (DEC); Rosenbach, Wendy A (DEC); Murray, Joseph R (DEC); Lansing, James (DEC)
Subject: Annellotech

Tom, doesn't look as though DAR has any jurisdiction over the proposed expansion of the R&D operations at Annellotech.

The facility is exempt from permitting and our 212 toxics rule.

§201-3.1 Applicability

(a) Except as provided in subdivision (c) of this section, the owner or operator of an emission source listed as an exempt or trivial activity in this Subpart is exempt from the registration and permitting provisions of Subparts 201-4, 201-5, and 201-6 of this Part.

(40) Ventilating and exhaust systems for laboratory operations. Laboratory operations do not include processes having a primary purpose to produce commercial quantities of materials.

44) Research and development activities, including both stand-alone and activities within a major facility, until such time as the administrator completes a rule making to determine how the permitting program should be structured for these activities.

Benzene, Toluene and Xylene will be emitted from the proposed stack but they are exempt from Part 212 (toxics rule).

§212.7 Exceptions

The following process emission sources are not subject to the provisions of this Part:

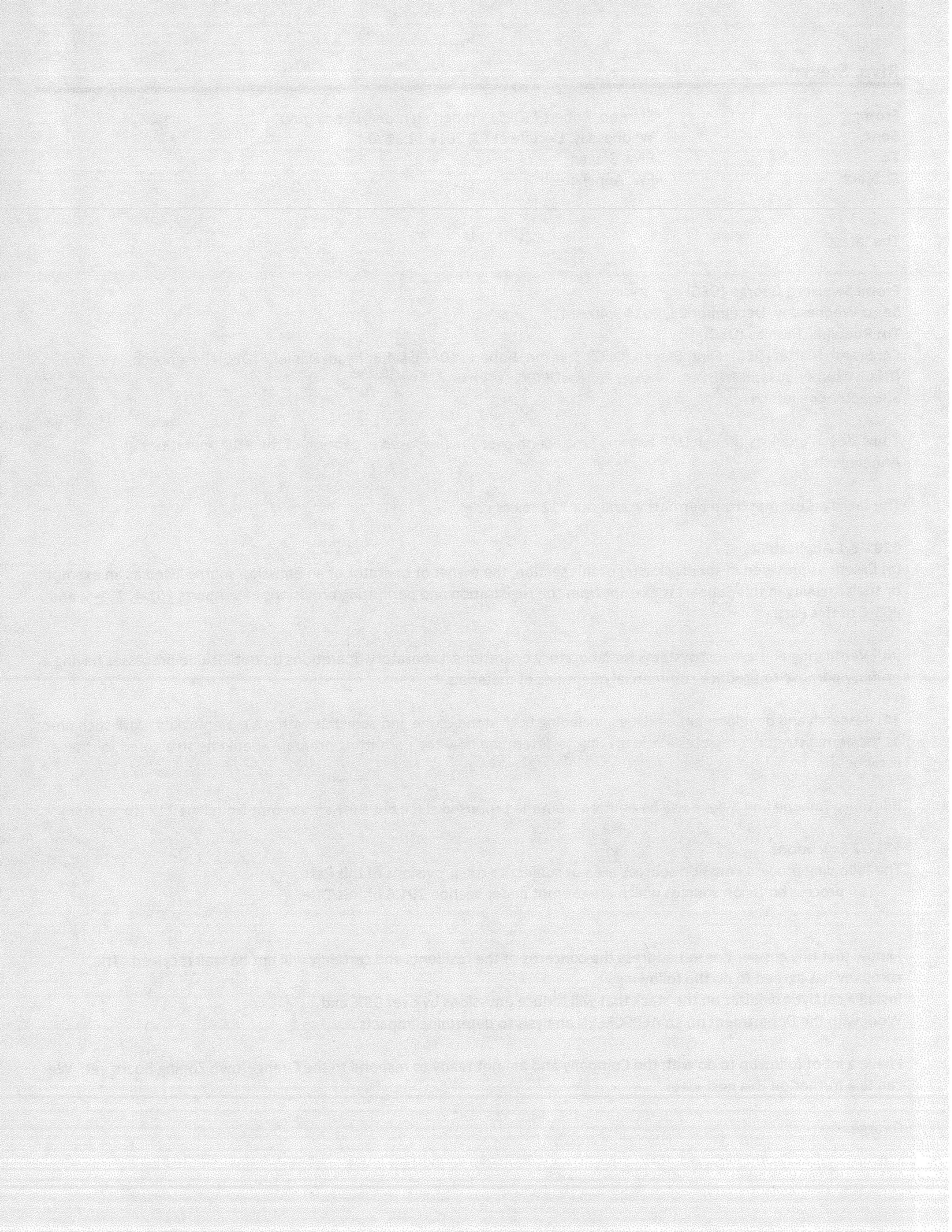
- (a) process emission sources which are exempt under section 201.6 of this Title;

I know that this answer doesn't address the concerns of the residents and certainly will not be well received. The company has agreed to do the following;

Install a catalytic oxidizer on the stack that will reduce emissions by over 98% and
Work with the Department on an AERSCREEN analysis to determine impacts

I have a lot of followup to do with the Company and am not ready to respond to the Orangetown Zoning Board yet. We can talk further on this next week.

George.



Riva, Steven

From: Ruvo, Richard
Sent: Tuesday, January 20, 2015 1:15 PM
To: John J. Tormey III, Esq.
Subject: RE: January 20, 2015 - Anellotech Meeting Tomorrow, Wednesday January 21 - Urgent

I recommend you contact Mr. George Sweikert of the New York State Department of Environmental Conservation at (845) 256-3185. The NYSDEC, being the primary permitting authority, is more familiar with the status of this facility.

From: John J. Tormey III, Esq. [mailto:jtormey@optonline.net]
Sent: Tuesday, January 20, 2015 10:33 AM
To: Ruvo, Richard
Subject: January 20, 2015 - Anellotech Meeting Tomorrow, Wednesday January 21 - Urgent
Importance: High

Dear Mr. Ruvo:

First, my apologies for the "Urgent" flag on this e-mail. I realize that all of your work at EPA must be urgent.

I am a lawyer who lives in the Hamlet of Pearl River, Town of Orangetown, County of Rockland.

I am writing to ask if you or one of your EPA colleagues can please attend and cover the critical meeting tomorrow at Orangetown Town Hall regarding a start-up company called Anellotech.

Anellotech has unapologetically told us Pearl River residents that they will erect a smokestack - which they euphemistically call a "vent pipe" - 99 feet in the sky, so as to extrude toxic, poisonous, carcinogenic benzene, toluene, and xylenes directly into the air that we residents breathe. Anellotech is seeking to build an industrial waste facility on the Pfizer campus - which they euphemistically refer to as "green" "R&D".

Can you please initiate immediate EPA involvement in this matter? The meeting tomorrow is before the Town of Orangetown Zoning Board of Appeals, as I understand it.

The matter has evoked a ton of public attention, and media involvement as well, now. In principle alone, it would be important for EPA to be present.

My cell phone is 914-450-9595.

My best, and thank you, to you and your colleagues,

John J. Tormey III, Esq.

Law Office of John J. Tormey III, Esq.
John J. Tormey III, PLLC
1324 Lexington Avenue, PMB 188
New York, NY 10128 USA
1-212-410-4142 (phone)
1-212-410-2380 (fax)
www.tormey.org
jtormey@optonline.net

